SAUGET AREA I, SAUGET, ILLINOIS

16/15 147838

MONSANTO COMPANY SUBMISSION OF DOCUMENTS REQUESTED BY THE U.S. ENVIRONMENTAL PROTECTION AGENCY (JANUARY 6, 1995)

	FUNDER IDENTICATION AND DOCUMENT NUMBER	DESCRIPTION OF DOCUMENT
1.	BOX 1	
	Folder I-F-33 cer055378 - cer055744	American Bottoms Sampling Report - Fate and Effect Analysis
2.	Folder I-F-41 cer062361 - cer062366	10/31/81 Dead Creek Project Scope of Work
3.	Folder I-F-48 cer067212	10/21/81 Recommendation against Dead Creek for storm water storage
	cer067216 - cer067223	2/27/81 Measurement of PCBs in soil cores from W.G. Krummrich Plant
	cer067255	11/30/80 Area News: Dead Creek Haunts Quiet
	cer067256	11/26/80 Press query
4.	Folder I-F-50 cer068191 - cer068221	Nov. '88 Expanded SI Dead Creek Project Sites at Cahokia/Sauget, IL
	cer068222 - cer068240	Sept. '87 Comments on Dead Creek Sites RI/FS
5.	Folder I-F-52 cer069585	9/22/80 Press query
	cer069586	News Report: Dead Creek Not a Health Hazard
	cer069592 - cer069593	News: Impact of Dead Creek Studied
	cer069595	9/23/80 St. Louis Globe: Sauget Site Investigated for Toxic Chemicals
	cer069596	9/19/80 Press query
	ce1069609 - ce1069610	3/8/80 Soil sample analysis
)	cer069616 - cer069617	Handwritten notes

	FUNDER IDENTICATION AND DOCUMENT NUMBER	DESCRIPTION OF DOCUMENT
С	er069651	6/7/71 W.G. Krummrich Plant Sewer Map
С	er069664 - cer069665	11/12/80 Off the record notes
C	er069666 - cer069669	11/10/80 Meeting with IEPA re: "Dead Creek" 11/7/80
c	er069671	11/11/80 Press query
С	er069880 - cer069881	Handwritten notes
С	er069885 - cer069896	10/15/80 Trucking operations - W.G.Krummrich
С	er069901 - cer069909	10/2/80 Re-draft of Background Sheet on Krummrich Waste Disposal
C	er069939 - cer069940	11/14/80 Monsanto not interested in participating in voluntary clean-up
BOX 2		
	older I-F-64 er078760 - cer078806	4/20/87 USEPA phone call re: Sauget - Site G 4/16/87 USEPA phone call re: Site G with notes Eckhardt Surveys
	older I-F-66 er080702 - cer080768	Cerro Drum Incident: memos and sample analysis
	older I-F-68 er081826 - cer080733	July '88 Fact Sheet #3, Sauget Sites/Dead Creek
BOX 3		
	older I-F-77 er086727 - cer086739	Village of Sauget Sanitary Dev. & Research Association (SDRA). Costs and Run-off Calculations
C€	er087877 - cer087900	9/4/73 East-West Gateway Env. Task Force - Regional WTP Recommendations 8/28/73 Metro-East Regional WWT Facility 7/31/73 Metro-East Regional WWT Assessment

DESCRIPTION OF DOCUMENT

BOX 4

10. Folder I-F-81 cer089469

Zone A Chlorobenzene Industrial Hygiene and RCRA Training Outline

11. Folder I-F-89 cer093769

Cerro Copper, Status Report Dead Creek Sector A

12. Folder I-F-92 cer095441

8/23/89 Monsanto letter re: PRPs 9/15/71 Monsanto inter-office re: approval for dumping into the sewers 11/10/80 Meeting with 1EPA Re: Dead Creek 11/1/89 Monsanto - Mayor Sauget Re: sewer lines

13. Folder I-F-95 cer097839 - cer097860

2/26/87 Geraghty & Miller's comments on E&E's work plan for IEPA Dead Creek Sites project
2/12/90 Geraghty & Miller's "Proposal for a Soil Boring Project at Dead Creek, Sector B"

cer097922 - cer098519

7/18/88 Geraghty & Miller's comments on E&E's "Expanded Site Investigation, Dead Creek Project Sites" 5/8/70 Status of Aroclor Pollution Control - May Report, W.G. Krummrich Plant

14. Folder I-F-97 cer099667 - cer099674

7/22/81 Sewer Interconnection Box Investigation Report

15. Folder I-F-102 cer102723 - cer102732

5/20/71 PCB Analytical Interference 9/18/80 Background on Harold Waggoner & Co.

BOX 6

16. Folder P-1 cer000324

7/27/90 Cerro Letter to PRPs re: clean-up 8/4/86 Proposal to Implement Revised SOW for Dead Creek RI/FS 9/21/87 Comments by Sauget SDRA on the RI/FS

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DESCRIPTION OF DOCUMENT

17.	Folder P-7 cer006425 - cer006480	1/31/92 Preliminary Scope of Work
	cer006585 - cer006618	1/6/92 Data summary tables for soil/sediment samples from Sector B, Site L, and Site M
	cer006703 - cer006712	2/26/92 Proposal for Remediation of PCB contaminated material at Dead Creek Site for Monsanto
	cer006718 - cer006722	2/13/92 plan view & cross section of Dead Creek
	cer006724 - cer006729	2/7/92 Dead Creek figures
4	cer006731	Site on Sauget topo.
18.	Folder P-9 cer007500 - cer007520	Invitations to participate in discussion of SOW
	cer007521 - cer007655	11/20/91 Proposal for Stabilization & Filtration Treatability Studies for Dead Creek
19.	Folder P-10 cer007680 - cer007713	4/28/92 Risk Assessment of Dead Creek Sector B and Sites L and M
	cer007717 - cer007719	2/18/92 Sediment Removal Estimate - Dead Creek
	cer007731 - cer007741	2/21/92 Preliminary Cost Estimate - Dead Creek
	cer007893 - cer007896	1/18/90 Permit for Cerro to construct water pollution control facilities
	cer007957 - cer007965	2/12/88 Cerro Pretreatment Regulation Order
20.	Folder P-11 cer008091 cer008094 - cer008140 cer008143 - cer008147	11/26/80 Press query Press queries, inter-office memo's, etc. 10/2/80 Re-draft of background on Krummrich waste disposal

	IDENTICATION UMBER	DESCRIPTION OF DOCUMENT
cer008156	- cer008166	10/3/80 Mtg. minutes with IEPA 10/21/80 Fact Sheet: W.G. Krummrich/Dead Creek 9/30/80 Press query
cer008172	- cer008180	10/31/80 Measurement of selected chemicals from Dead Creek
cer008252	- cer008258	11/10/80 Meeting with IEPA re "Dead Creek" 9/8/80 Soil Sample Analysis
cer008259	9 - cer008290 ·	10/28/80 Measurement of selected chemicals from the Dead Creek Site: IEPA Split Samples, Cerro Copper Co., W.G. Krummrich plant samplings
cer008324	- cer008330	8/22/90 Access Agreement
cer008427	/ - cer008431	6/5/90 Monsanto Proposal Dead Creek Sector B
cer008446	- cer008454	11/10/80 IEPA & Monsanto soil analysis
cer008463	- cer008466	Press queries
cer008536	- cer008587	May 1988 Comments on expanded Site Inspection: Dead Creek
21. Folder P- cer008621	12 - cer008622	9/5/80 Smoking ditch
22. Folder P- cer008832		6/1/61 Map: Existing Sewerage
cer008835		6/2/22 Map: Profile of Dead Creek South of Spillway
cer008837		8/21/63 Map: Monsanto Village existing sewers
23. Folder P- cer009032	14 - cer009059	May '83 Village of Sauget storm sewer study Cerro/Dead Creek alternate various memos concerning Dead Creek clean-up
cer009081	- cer009085	11/26/91 Cerro v. Monsanto

	FUNDER IDENTICATION AND DOCUMENT NUMBER	DESCRIPTION OF DOCUMENT
24.	Folder P-18 cer010843 - cer010847	Dept. 790, AROCLOR incineration, 1976 Operations Report
25.	Folder P-48 cer037285 - cer037287	Chronology of Dead Creek waste disposal
	cer037316 - cer037323	11/11/80 9/17 - 11/7 sampling chronology
вох	7	
26.	Folder P-F-51 cer011239 - cer011241	Environmental materials analyzed for PCBs
	cer011371 - cer011372	Performance Review 1970, objectives, PCB problem
	cer011373 - cer011393	Presentation of the PCB Mgmt Plan (material redacted)
вох	13	
27.	Folder P-F-92 cer053225 - cer053227	Chronology of waste to Dead Creek: 1920 - 1972
	cer053385 - cer053386	6/25/87 Cerro - Monsanto: Clean-up Negotiations
28.	Folder P-F-103 cer068270 - cer068271	9/15/86 Projects to improve ground water
	cer067273 - cer067381	March '81, Pretreatment Program for Sauget's Physical-Chemical WWT Facility
29.	Folder P-F-104 cer069220 - cer069233	12/22/87 Response to IEPA/USEPA Comments Re: Monsanto Ground-Water Assessment Report
	cer082375 - cer082407	2/4/72 Industrial Wastewater Discharges Report

DESCRIPTION OF DOCUMENT

BOX 14

30. Folder P-F-110 cer091389 Handwritten notes cer091390 - cer091397 8/2/90 Cerro's Notice of Availability of Information on the Sector A Dead Creek Removal cer092358 - cer092361 Minutes of Sept. 1987 Sauget SDRA Board Meeting cer093513 11/25/91 W.G. Krummrich Plant overall property layout cer093568 - cer093666 3/84, 9/84 Investigation of Ground-Water Conditions at the W.G. Krummrich Plant, 1st and 3rd Qtr. Reports 31. Folder P-F-112 cer095209 - cer095325 Aug. '90, Field sampling report, Periodic Compliance Report Monitoring for Cerro cer095326 - cer095333 Dead Creek Chronology, maps and sample analysis cer095334 - cer095337 10/21/80 Fact Sheet: W.G. Krummrich/Dead Creek cer095338 - cer095343 12/11/69 Water Pollution Aroclor Control cer095344 - cer095350 Aroclor memos (material redacted) cer095374 - cer095375 9/29/69 Current Size of Aroclor Sewer Losses cer095388 - cer095389 Sauget Site Options (material redacted) 32. Folder P-F-115 cer098415 - cer098416 2/17/71 PCB content in water/sediment samples cer098419 - cer098422 1/5/71 Status: Aroclor Pollution Control Project 2/17/71 PCB content in water/sediment samples cer098479 - cer098485 Dec. '69 Aroclor control

	FUNDER IDENTICATION AND DOCUMENT NUMBER	DESCRIPTION OF DOCUMENT
	cer098488 - cer098539	Aroclor and PCB memos and sample analysis
33.	Folder P-F-116 cer098640 - cer098642	Aug. '24 Agreement between Alton and Southern RR and the Monsanto Chemical Works Re: sewer pipes
	cer099661 - cer099662	6/26/81 Route 3 manhole repairs, technical staff conference
34.	Folder P-F-120 cer107582 - 107585	3/10/82 U.S. EPA memo Re: Sauget Publically Owned Sewage Treatment Works (grossly inadequate)
35.	Folder P-F-121 cer108616 - 108622	Report by Monsanto's Dept. of Medicine and Environmental Health (material redacted)
вох	15	
36.	Folder P-F-122 cer110794 - cer 110797	7/1/77 Response to U.S. EPA Information Request
37.	Folder P-F-123 cer112221 - cer112233	10/14/77 Definition of WGK waste streams (material redacted)
38.	Folder P-F-125 cer113132	4/20/41 Sewer Easements: Village of Monsanto
	cer113197 - cer113209	Dead Creek photos, check for $^1/_3$ of fence costs
•	cer113231 - cer113238	5/14/87 Dead Creek: Site G, & Site G Fence Project
	cerl13252 - cerl13271	WGK-groundwater study/drum site memos & status reports (material redacted)
39.	Folder P-F-127 cer114376 - cer114408	Sept. '87 comments on the Dead Creek RI/FS
40.	Folder P-F-128 cerl14447 - cerl14460	2/27/81 Measurement of PCBs in soil cores from W.G. Krummrich Plant

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BOX 16

41.	Folder P-F-148 cer127383 - cer127387	9/12/90 Ltr re: Midwest Rubber R Div.	eclaiming
	cer127392 - cer127393	8/13/90 Ltr re: Midwest Rubber R Div.	eclaiming
	cer127505 - cer127507	3/22/90 Handwritten notes re: Si	te I
	cer127564 - cer127571	2/14/90 See page 5 re: Sauget Si	tes
	cer127572 - cer127577	2/14/90 Midwest Rubber and Recla	iming Co.
	cer127597 - cer127601	11/9/89 Midwest Rubber and Recla	iming Co.
s	cer127624	8/10/89 Midwest Rubber memo	
	cer127861 - cer127862	2/10/87 Proceed with clean-up	
42.	Folder P-F-152 cer130269 - cer130270	9/22/89 Analysis or residue samp Cerro	le from

SAUGET AREA 1, SAUGET, [LLINOIS MONSANTO COMPANY 8/24/94 and 10/17/94 SUBMISSIONS OF POCUMENTS RESPONSIVE TO CERCLA SECTION 104(e) REQUEST

	Document	<u>Date</u>	Description
I.	104(e) Initial Response	8/24/94	pocuments attached listed below - (Sections 1 - 6.2)
1.	U.S. EPA to Monsanto	7/13/94	104(e) request
2.	Monsanto to U.S. EPA	7/28/87	Request for extension
3.	Monsanto to U.S. EPA	7/2/87	104(e) response & request attachment
4.	Monsanto to U.S. EPA	10/24/89	104(e) response
	IEPA to Monsanto	8/10/89	Combined General Notice CERCLA Section 104
A.	CBI - index of CBI:	Undated	
	Protective Order	7/17/84	
	Monsanto to P. Sauget	2/8/78	Extends contract
	Agreement Between Monsanto & P. Sauget	1/1/76	Cover letter 5/19/78 terminates agreement
	Landfill inventory	8/16/68 ?	
	Waste Disposal at Krummrich plant	6/29/77	
	Waste Disposal Status Report	3/9/71	
	Monsanto to P. Sauget	3/21/84	

	Document	Date	Description
	Monsanto to P. Sauget	12/15/78	Agreement for landfill privilege
В.	Index of documents		
	Heisler to Bohl	2/24/71	Krummrich waste disposal
	Landfill Lease	11/1/59	
	P. Sauget to Monsanto	10/25/77	Re: contract
	Monsanto to P. Sauget	11/15/78	Re: contract
	Monsanto to P. Sauget & attachments	3/25/80	Eckardt Report - WG Krummrich on-site waste disposal
	Waste Disposal Agreement	11/1/59	
	Landfill lease	1/1/64	
	Monsanto to Sauget & Co.	12/29/72	1/1/70 Lease attached
	Waste Disposal Agreement	1/1/64	
	Lease	1/1/64	
	Waste Disposal Agreement	1/1/64	
	copy of 73-75 contract	3/6/73	With Sauget & Co.
	Monsanto internal memo	9/12/60	Landfill operating procedure
	Disposal Operations Manual	Undated	

	Document	Date	Description
C.	Monsanto internal memo	10/27/75	IEPA landfill inspection
	Monsanto internal memo	6/4/74	Waste sample
	Monsanto internal memo	7/19/74	Chemical disposal
	Monsanto internal memo	7/19/74	Waste approved for landfill
	Progress Report	2/25/80	Waste quantity
D.	IEPA to Monsanto	2/25/80	Re: site description; includes attachments
	Landfill description	11/9/79	Sinise affidavit
	Progress Report	4/8/71	Volume and cost of waste
	Chart	1/1/68	Volume and type of waste
	Monsanto to ISWB	8/16/68	Chemicals and quantities
	Monsanto to IEPA	11/27/72	Chemicals and quantities
	Monsanto internal memo	1/27/77	Chemicals and quantities
	Notes on Eckhardt Survey	Undated	
	Queeny Plant '76 disposal	2/10/77	
	Progress Report	1/3/69	Type & volume of waste
	Progress Report	8/20/70	Type & volume of waste
	Queeny 103(c) notification	5/18/81	

	Document	<u>Date</u>	Description
	Monsanto internal memo	4/3/74	Type & volume of waste
E.	Eckhardt Report-Queeny Plant	Undated	Forms B & C
F.	General Waste Profile	9/19/89	
	Waste data sheet	6/19/81, 3/3/87	
	Boiler ash test results	12/12/85	Attached 10/5/89 waste profile
	Monsanto internal memo	7/13/89	EP toxicity results
G.	Correspondence from or to P. Sauget	Undated	Re: ash hauling
	Monsanto internal memo Re: P. Sauget	12/28/79	Bought additional land
	P. Sauget to Monsanto	11/22/78	Increased costs
	Agreement for Sanitary Landfill Privilege	1/1/79	
	Service Agreement	Undated	To MTS, Inc. signed by P. Sauget
	Monsanto to MTS/P. Sauget	3/18/86	Agreement attached
•	Service Agreement	8/1/84	Signed MTS/P. Sauget
	Agreement for dumping	12/11/57	Signed Leo Sauget
	MTS Trucking invoices	1982-1989	

	Document	Date	Description
	Monsanto internal memo	1/29/85	Pump test with drawing
5.1	MSDS for organic compounds	Undated	
5.2	MSDS for metals and cyanide	Undated	
6.0	Information on PRPs		
6.1	Area 1 PRP list & attachment	6/15/90	From IEPA General Notice 104(e)
	Lowenstein et al. to IEPA	11/30/89	Cerro suggestions of PRP
	Lowenstein et al. to IEPA	3/28/89	Cerro additional PRP information
6.2	Extracts from expanded SI	5/88	E&E Dead Creek project
A.	Site History	Undated	Site Inspection pages 2-41 to 2-68
В.	Findings	Undated	Site Inspection pages 7-1 to 7-6
C.	Site-specific Description	Undated	Sites G, H, I, CS-A, L, CS-A, M, CS-B, C-F
II.	Monsanto's 104(e) Final Response	10/17/94	Documents attached listed below (Sections 1 - 3.8)
1.0	U.S. EPA to Monsanto	7/13/94	104(e) Request
2.1	Monsanto to U.S. EPA	7/28/94	Confirmation of extension
2.2	Monsanto to U.S. EPA	8/24/94	Cover letter to initial response

	Document	<u>Date</u>	<u>Description</u>
3.0	Monsanto Response to Requests		
3.1	Response to 104(e) Request 5		List of plant managers
3.2	Response to 104(e) Requests 8-17		
	Brochure "Welcome to W.G. Krummrich Plant"		
	Monsanto internal memo	4/10/57	Request for plant history
	Monsanto internal memo	4/30/57	Plant history
	Monsanto internal memo	4/24/57	Plant history
	Monsanto internal memo	5/8/57	Plant history
	Plant A Finished Product Code Definition	Undated	Plant history
	Monsanto - U.S. Government in WWII	Undated	Chronology & products
	War Activities Review		
	Annual Report (excerpt)	1940	
	Annual Report (excerpt)	1941	
	Annual Report (excerpt)	1945	

	<u>Document</u>	Date	Description
	Stockholders Report (excerpt)	1945	
	Annual Meeting of Stockholders Report	1946	
	Form 10-K	1940	
	Form 10-K	1941	
	Form 10-K	1942	
	Chemical Warfare Service to Monsanto	2/18/42	Re: Contract
	Prospectus - preferred stock	3/4/42	
	list of Krummrich Plant products	1957	
	Monsanto internal memo	7/3/68	Krummrich history of employees and products
3.3	Response to 104(e) Requests 22-28		•
	Report on disposal of solid toxic wastes	11/8/57	Protected Material
	Agreement for Dumping Privileges	12/11/57	IEPA to P. Sauget Re: inspection defiencies; 12/2/70 letter attached
	Waste Disposal Agreement	1/1/64	

Document	Date	Description
Lease	1/1/64	·
P. Sauget to Monsanto	3/15/65	Name changes
Agreement for Dumping Privileges	12/11/57	
Lease: Waste Disposal Area	1/1/64	
Monsanto internal memo	10/14/72	Status Report - Disposal of Trash
Agreement for Dumping Privileges with P. Sauget	1/1/73	
Agreement for Dumping Privileges with P. Sauget	1/1/72	
Waste Disposal Agreement Monsanto to P. Sauget	3/18/71, 9/1/71	
Waste Disposal Agreement with Procedures for handling contaminated metals 3/18/71	Undated	
IEPA to P. Sauget	5/7/73	Violations
Internal Monsanto memo with attachment	12/1/72	'72 prices remain in effect
Monsanto to P. Sauget & Co.	12/29/72	Extension of lease
Monsanto internal memo	7/5/66	Landfill costs

<u>Document</u>	Date	Description
J.J. Seano	10/20/80	W.C. Krummrich waste disposal
Progress Report	12/10/6 ² , 11/27/6 ³ , 5/4/64	Sewer plans
Village Sewer Rehab Review	8/5/87	
Weise to P. Sauget with attachments	8/7/87	Cleaning & Grouting Contract
Sewer finances	Undated	
Facility Plan Addendum	2/84	
Bid Proposals & Bonds	7/1/86	
Sauget Village Bid Evaluation	1/7/80	Sewer Rehab. Phase I, II & IIIa
Helmkamp to P. Sauget	12/20/\$5	Re: Bid
Sewer Rehab. Phases I, II, IIIa	Undated	Cost reduction
Monsanto to Baker	7/23/85	Monsanto to buy Searle
Village to Public Hearing	Undated	To create Special Service Area #1
Nuveen to Monsanto	12/2/83	Sewer Bond Project
IEPA to P. Sauget	4/2/84	Comments on Facility Plan Addendum

Document	<u>Date</u>	Description
Baker to P. Sauget	10/19/84	Mercantile not interested in short term maturities
Baker to P. Sauget	12/3/84	Banking Agreement with Conterre
Preliminary Official Statement	9/28/85	Special Services Area #1 bond transactions
Baker to P. Sauget	11/1/89	Draft Report re: Contractual Rights to Sewer
Lotzy to Roddy	2/13/90	Sewer capacity
Sewer Status Presentation	1/19/90, 2/8/90	
Monsanto Appropriation Request	6/23/83	Sewer
Village of Sauget to Monsanto	6/15/81	Adoption of Sewer Agreement
Weise to Monsanto	7/22/81	Sewer Investigation Report
W.G. Krummrich Plant	7/16/74	Water Pollution Control
Facility Plan Addendum	2/84	
Monsanto internal memo	2/6/81	ACL Waste Treatment Report
Progress Report	6/11/81	ACL Interim Waste Treatment
Monsanto internal memo	11/21/83	Project Scope Residue Still Rupture Disc

Document	<u>Date</u>	Description
Chlorophenol Decontamination	3/2/83	With washout transfer sheet
South Trunk Sewer file	7/82- 12/8 4	·· .
South Trunk Sewer file	1/85 - 6/85	
South Trunk Sewer file	7/85 - 12/85	
Krummrich Sewers I	1976	
Environmental Impact - South Trunk	8/23/82	
Environmental Control Review - South Trunk	7/16/82	
Project Initiation Request	11/16/82	
Appropriation Project Definition Report	4/7/83	
Project Initiation Request	10/19/82	
Project Initiation Request	9/28/82	
Project Premise Report	3/4/82	
Monsanto to IL AG	4/21/81	Location of waste disposal

	Document	<u>Date</u>	Description
3.5	Responsive to 104(e) Request #35		
	IL vs. P. Sauget	filed: 6/16/86	With exhibits
3.6	Response to 104(e) Request #36		,
	103(c) Notification	5/18/81	
3.7	Response to 104(e) Request #39		
	Village of Sauget Wastewater Discharge Permit for Monsanto Co.	9/1/92	
	Petition on Appeal from Discharge Permit	10/24/88	
	Final Permit	4/28/89	
3.8	Response to 104(e) Requests #47 & 49		
	Sector B Sediment & Soil Sampling	5/4/90	
	ILEPA Split Samples		
	Proposal of Soil Boring Programs	9/19/90, 2/12/90	
	Site Inspection excerpts		

<u>Document</u>	<u>Date</u>	Description
Workplan for SI for Dead Creek Sector B, Sites L & M	8/91	Draft
Proposal for Soil Boring Project	7/23/91	·*
Measurement of PCBs in Krummrich Soil Cores	2/27/81	
Measurement of Selected Chemicals	10/28/80	
Smoking Ditch	9/5/80	
Soil Sample Analysis	9/8/80	
Proposal for Soil Boring Project	2/12/90	
Measurement of Selected Chemicals in Soil	10/28- 31/80	
Monsanto Proposal Dead Creek Sector B	6/5/90	
Method & Special Reports		